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22 MONUMENTAL LIFE INSURANCE COMPANY

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24 UNITED STATES DISTRICT COURT  
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26 NORTHERN DISTRICT OF CALIFORNIA  
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29 JOSEPH HADDAD,  
30 Plaintiff,  
31 v.  
32 MONUMENTAL LIFE INSURANCE  
33 COMPANY,  
34 Defendant.  
35

36 Case No. 13-cv-01636-YGR

37 [PROPOSED] CASE MANAGEMENT  
38 ORDER

On February 24, 2014, the Court held a further Case Management Conference in the above referenced matter, the Honorable Yvonne Gonzalez Rogers, United States District Court Judge, presiding. After consideration of the pleadings and files in this case, and after discussion with counsel, the Court makes the following orders:

1. The case management schedule previously set in this matter is modified as follows:

A. Fact discovery cut-off: March 14, 2014 as to written discovery propounded by Plaintiff and the depositions of Defendant's employees Joan Edinger and Justin Foreman only.

B. Mediation Completion Deadline: April 2, 2014. The parties have agreed to mediation before the Hon. William Cahill (Ret.) at JAMS, and have confirmed Judge Cahill's availability to conduct a half-day mediation in this matter on March 28, 2014.

C. Dispositive Motion Filing Deadline: April 22, 2014.

All other deadlines remain as previously set, including the following:

D. Expert witness disclosure: May 2, 2014.

E. Expert discovery cut-off: June 18, 2014.

F. Pretrial Conference: August 1, 2014.

G. Jury Trial: August 18, 2014.

2. The summary judgment pre-filing conference required under the Standing Orders of the Court is set for April 4, 2014 at 9:30 a.m. Defendant (the moving party) shall file the required pre-filing statement by noon on April 1, 2014. Plaintiff's response to the pre-filing statement shall be filed by noon on April 3, 2014.

3. Discovery and disclosure deadlines that do not impact the Court's calendar, including fact discovery cut-off and expert disclosure deadlines, may be modified by stipulation of the parties without further order of the Court.

Dated: March 3, 2014

Yvonne Gonzalez Rogers  
HONORABLE YVONNE GONZALEZ ROGERS  
UNITED STATES DISTRICT COURT JUDGE

1 **APPROVED AS TO FORM:**

2 Dated: February 26, 2014

3 By /s/ Angela J. Rafoth

4 KURT R. BOCKES  
5 ANGELA J. RAFOTH  
6 LITTLER MENDELSON  
7 A Professional Corporation  
8 Attorneys for Defendant  
9 MONUMENTAL LIFE INSURANCE CO.

10 Dated: February 26, 2014

11 By /s/ Gary A. Angel

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